

APPENDIX I

1 maps that were attached to the complaint?

2 MR. YEAGER: You can answer that question.

3 THE WITNESS: I produced a number of simulated
4 maps.

5 BY MR. CARVIN:

6 Q. Okay. In your report obviously you produced -- let's use
7 Congress as an example, you produced a thousand alternative
8 maps for Congress?

9 A. Yes, sir.

10 Q. Is that, when you say you produced a number are those the
11 maps you're referring to?

12 A. Yes.

13 Q. Okay. One map was attached to the complaint. Do you know --

14 A. Oh, let me actually go back and clarify my answer if I could.

15 MR. YEAGER: Go ahead.

16 THE WITNESS: So you are correct in that I produced
17 one thousand congressional maps and obviously one thousand
18 Senate maps and one thousand House maps.

19 Even before, I recall as early as 2016, I had
20 already -- I had already produced a, also a number of maps, I
21 recall of the House and Senate plans. I don't recall the
22 Congressional plans. But I had produced already a large
23 number of House and Senate maps.

24 BY MR. CARVIN:

25 Q. In connection with this litigation?

1 A. They were -- back in 2016 I was just first producing draft
2 simulations.

3 Q. But why?

4 MR. YEAGER: Can I just comment?

5 MR. CARVIN: Yes.

6 MR. YEAGER: We had engaged him. He was doing
7 preliminary work that led to this case.

8 MR. CARVIN: That's what I'm trying to figure out.

9 BY MR. CARVIN:

10 Q. When you say a large number, for example, how many -- in the
11 rough neighborhood how many House maps did you produce?

12 A. Definitely over ten.

13 Q. Okay.

14 A. I don't recall, and certainly didn't keep record of --

15 Q. Were those ten produced pursuant to the same algorithm that
16 you later used for the one thousand?

17 A. No. An earlier draft.

18 Q. Okay. An earlier draft of the algorithm?

19 A. To my recollection, when I started out I went through
20 multiple drafts, and went through structural changes. And so
21 certainly I had produced, using earlier drafts of my
22 simulation algorithm, a number of House and Senate plans.

23 Q. When you use the word draft, do you mean draft simulation
24 algorithms or draft actual maps?

25 A. Both.